



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 7

11201 Renner Boulevard
Lenexa, Kansas 66219

FEB 09 2015

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Article No.: 7004 2510 0006 9727 4686

Ms. Cheri T. Holley
DICO
2345 East Market Street
Des Moines, Iowa 50317

Re: NOTICE OF ACCEPTANCE
Administrative Order, Docket No. 86-F0011
DICO's Performance Evaluation Report No. 28, Groundwater Extraction and Treatment System,
Des Moines TCE Site, Des Moines, Iowa

Dear Ms. Holley:

The U.S. Environmental Protection Agency received DICO's modified Performance Evaluation Report No. 28 (Report) on October 16, 2014, followed with the email responses/clarifications from Mr. Gazi. The EPA has reviewed the Report and the email from Mr. Gazi.

The EPA disagrees with DICO's contention, mentioned on page 1 fourth paragraph that the system has reached the stage where it can be eliminated. The EPA has communicated its position to DICO repeatedly through comments provided on past Performance Evaluation Reports. The EPA also would like to point out DICO's consultant agrees with EPA's position in the Report via the statement that can be found on page 3, Section 2.3, last sentence of the paragraph which states: "The contaminant...and indicates continued recovery and plume contaminant is necessary to extract source mass."

Even though EPA accepts Report No. 28, the Agency strongly disagrees with the unfounded conclusion in the Report that the system has reached a stage where it can be eliminated. Accordingly, all EPA's notices, emails, or other records setting forth its position will be placed in its record file attached to Dico's Report No. 28.

On a separate matter, EPA must impress upon DICO the need to ensure proper and continuous functioning of the system along with its extraction and recovery wells. As stated in the Administrative Order, one of the purposes of the groundwater collection system is to control groundwater movement to prevent potential contaminant impacts to the North Gallery. Prolonged and/or repeated shut down, due to freezing of pipes, of any of the wells will affect the movement of the groundwater, which in turn may impact the North Gallery. The Administrative Order requires, the system to be operated on a continuous

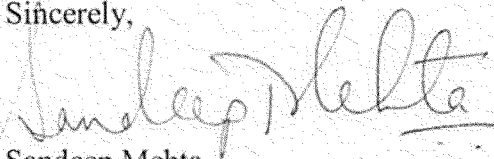


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basis, and, Dico to have a corrective action plan in place to address partial or complete failure of the system. The freezing of the pipes and shut down of any of the wells can be and must be avoided in the future. The EPA requests, within 30 days of receipt of this letter, Dico identify in a letter or work plan to EPA what steps it intends to take to prevent the shutdown of any of the wells in the system for a prolonged period of time.

If you have any questions concerning this matter, please contact me at (913) 551-7454.

Sincerely,



Sandeep Mehta
Remedial Project Manager
Iowa/Nebraska Remedial Branch
Superfund Division

cc: Brian Mills, Consultant, DICO (via e-mail only)
Gazi George, Consultant, (via e-mail only)
Hylton Jackson, IDNR (via e-mail only)
Vern Rash, DMWW (via e-mail only)